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October 24, 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, NW, Room 222  
Washington, D.C. 20554

RE: Ex Parte Meeting  
CC DKT. 97-208 Application by BellSouth Telecommunications, Inc. and  
BellSouth Long Distance, Inc. for Provisioning of In-Region, InterLata  
Service in South Carolina.

Dear Mr. Caton:

On Thursday October 23, 1997, Kenneth P. McNeely, Stephen C. Garavito, G. Wayne Ellison and I of AT&T and Mark Haddad of Sidley & Austin met with Michael Pryor, Jordan Goldstein, Melissa Newman, Steven Teplitz and Jeannie Su of the Common Carrier Bureau's Policy and Program Planning Division and Thomas Power and Anu Searu of the Common Carrier Bureau's Competitive Pricing Division. The purpose of this meeting was to discuss an overview of issues raised in AT&T's Comments in the above referenced proceeding and specific issues related to the availability of Section 271 (c) (1) (B) entry and pricing issues raised in those Comments .

Attached are the three documents used during the presentation:

1. A brief outline of the presentation submitted during the meeting of AT&T;
2. The BellSouth South Carolina SGAT Price List, which was used for illustrative purposes and is already a part of the record as Attachment A to the Affidavit of Alphonso J. Varner on behalf of BellSouth; and

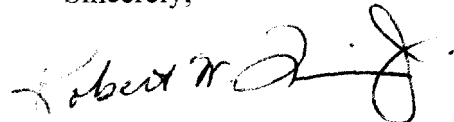
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3. A four-page exhibit that was attached as an Exhibit (RSC-3) to the testimony of BellSouth witness Robert C. Scheye in the AT&T/BellSouth Arbitration proceeding, SCPSC Docket No. 96-358-C, which discusses the source of prices proposed by BellSouth during the AT&T/BellSouth arbitration for unbundled elements. This four-page exhibit, which was referenced but inadvertently omitted from Mr. Wood's affidavit, is provided as a written ex-parte submission pursuant to the Revised Procedure for Bell Operating Company Applications Under Section 271 of the Communications Act, FCC 97-330, dated September 19, 1997.

Additionally, as requested by the Common Carrier Bureau, Policy and Program Planning Division Staff, I have also provided the Order of the South Carolina Public Service Commission, Docket no. 96-358-C, Order No. 97-712, dated August 19, 1997, creating the permanent pricing docket for unbundled elements in South Carolina.

Two copies of this Notice are being submitted on the following business day to the Secretary of the FCC in accordance with Section 1.1206(a)(2) of the Commission's rules.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert C. Scheye", with a stylized flourish at the end.

Attachments

cc: J. Glodstein  
T. Power  
M. Pryor  
A. Searu  
J. Su  
S. Teplitz

SOUTH CAROLINA - Bellsouth TELRIC AND PROPOSED PRICES					
UNBUNDLED ELEMENT	BST TELRIC Filed	Proposed Price - Existing Tariff	Tariff Rate Source	Proposed Price - True-Up	True-up Rate Source
<b>Unbundled Loops</b>					
2-Wire Analog Voice Grade Loop, Per Month	\$30.38	\$25.00	E7.5.3	\$18.00	ACSI neg. rates
Nonrecurring - First/additional		\$140.00 / \$45.00*		\$51.20	-
4-Wire Analog Voice Grade Loop, Per Month	\$49.42	\$45.00	E7.5.3	\$28.80	-
Nonrecurring - First/additional		\$140.00 / \$45.00*		\$51.20	-
2-Wire ISDN Digital Grade Loop, Per Month	\$47.34			\$28.80	-
Nonrecurring - First/additional				\$51.20	-
2-Wire ADSL/HDSL Loop, Per Month				\$18.00	-
Nonrecurring - First/additional				\$51.20	-
4-wire HDSL Loop, Per Month				\$28.80	-
Nonrecurring - First/additional				\$51.20	-
4-Wire DS1 Digital Grade Loop, Per Month	\$83.19	\$124.00	E7.5.6		
Nonrecurring - First/additional		\$875.00 / \$310.00	-		
<b>Unbundled Exchange Access IOC - Voice Grade</b>					
0 - 8 Miles, Fixed Per Month	\$17.85	\$50.00	E7.5.3		
Per Mile, Per Month	\$0.0248	\$2.05	-		
9 - 25 Miles, Fixed Per Month	\$17.66	\$50.00	-		
Per Mile, Per Month	\$0.0270	\$2.00	-		
Over 25 Miles, Fixed Per Month	\$17.66	\$50.00	-		
Per Mile, Per Month	\$0.0270	\$1.95	-		
Nonrecurring		\$100.00	-		
<b>Unbundled Local Switching**</b>					
<b>Unbundled Exchange Ports</b>					
2-wire Analog, Per Month	\$2.58			\$2.70	TELRIC
Nonrecurring - First/additional				\$50.00 / \$18.00	Cost estimates
4-wire Analog (Coin), Per Month	\$3.03			\$4.00	TELRIC
Nonrecurring - First/additional				\$50.00 / \$18.00	Cost estimates
4-wire ISDN DS1, Per Month	\$262.26			\$320.00	TELRIC
Nonrecurring - First/additional				\$230.00 / \$200.00	Cost estimates
2-Wire ISDN Digital, Per Month	\$11.93			\$14.50	TELRIC
Nonrecurring - First/additional				\$150.00 / \$120.00	Cost estimates
2-Wire Analog Hunting - per line - Per Month	\$0.30			\$0.30	TELRIC
Nonrecurring				\$3.00	Cost estimates
<b>Unbundled Local Usage (Restructured Switching)</b>					
End Office Switching, per mou	\$0.002033			\$0.0021	15% E.O. 3-90 Rate
Tandem Switching, per mou	\$0.005110			\$0.0074	E6.8.1.D
Common Transport, Per Mile, per mou	\$0.000390			\$0.0004	E6.8.1.C
Common Transport, Facility Termination, per month				\$0.00036	E6.8.1.C
* Non-recurring rates for these services have been adjusted downward during negotiations and are not currently tariffed.					
** The unbundled local switching consists of a port charge plus an associated usage charge.					
Vertical features are not included in this usage rate. See Exhibit RCS-5.					

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SOUTH CAROLINA - BELL SOUTH TELRIC AND PROPOSED PRICES					
UNBUNDLED ELEMENT	BST TELRIC Filed	Proposed Price - Existing Tariff	Tariff Rate Source	Proposed Price - True-Up	True-up Rate Source
<b>Local Interconnection*</b>					
End Office Switching Per MOU		\$0.01095	E6.8.3		
Tandem Switching Per MOU		\$0.00074	E6.8.1.D.		
Common Transport Per Mile/MOU		\$0.00004	E6.8.1.C.		
Common Transport - Facility Termination Per MOU		\$0.00036	E6.8.1.C.		
Intermediary Tandem Per MOU**				\$0.002	Agreements
<b>Dedicated Transport - DS1 only</b>					
Per Mile, Per Month		\$23.00	E6.8.1.B.		
Facility Termination, Per Month		\$90.00	-		
Facility Termination, NRC		\$100.49	-		
Other dedicated transport levels					
<b>Channelization System - For Unbundled Loops</b>					
Unbundled Loop System (DS1to VG) per sys/per mo.	\$415.37			\$400.00	ACSI neg. rates
Nonrecurring				\$525.00	-
Central Office Interface Per Circuit, Per Month	\$1.26			\$1.15	-
Nonrecurring				\$8.00	-
<b>CCS7 Signaling Transport Service</b>					
Signaling Connection Link, Per Month		\$155.00	FCC 1, Sec.6		
Nonrecurring		\$510.00	FCC 1, Sec.6		
Signaling Termination (Port), Per Month		\$355.00	FCC 1, Sec.6		
Signaling Usage, Per 56 Kbps Facility, Per Month				\$395.00	Cost Estimates
<b>800 Access Ten Digit Screening Service</b>					
Per 800 Call Utilizing 800 Acc.Ten Digit Screening					
Svc. w/800 Number Delivery, per query	\$0.0010	\$0.004	E6.8.4		
Per 800 Call Utilizing 800 Acc.Ten Digit Screening					
Svc. w/800 Number Delivery, w/Optional Complex					
Features, per query	\$0.0011	\$0.0045	E6.8.4		
Per 800 Call Utilizing 800 Acc.Ten Digit Screening					
Svc. w/POTS Number Delivery, per query	\$0.0010	\$0.004	E6.8.4		
Per 800 Call Utilizing 800 Acc.Ten Digit Screening					
Svc. w/POTS Number Delivery, w/Optional Complex					
Features, per query	\$0.0011	\$0.0045	E6.8.4		
Nonrecurring					
Reservation Charge per 800 Number reserved		\$26.50 1st / \$1.50 add'l	E13.3		
Est. Charge per 800 number est. w/800					
Number Delivery		\$60.00 1st / \$1.50 add'l	E13.3		
Est. Charge per 800 number est. w/POTS					
Number Delivery		\$60.00 1st / \$1.50 add'l	E13.3		
Customized Area of Service Per 800 Number		\$3.00 1st / \$1.50 add'l	E13.3		
Multiple InterLATA Carrier Routing per carrier					
requested, per 800 number		\$3.50 1st / \$2.00 add'l	E13.3		
Change Charge per request		\$40.50 1st / \$1.50 add'l	E13.3		
Call handling and Destination Features per		\$3.00	E13.3		
800 number					
<b>Line Information Database Access Service</b>					
Common Transport, Per Query, per month	\$0.00006	\$0.00030	FCC 1, Sec.19		
Validation, Per Query, per month	\$0.0004	\$0.0000	-		
Nonrecurring - Establishment or Change		\$91.00	-		
* See Exhibit RCS-6.					
** The tandem intermediary charge applies only to intermediary traffic and is applied in addition to applicable local interconnection charges.					

SOUTH CAROLINA - BELLSOUTH TELRIC AND PROPOSED PRICES					
UNBUNDLED ELEMENT	BST TELRIC Filed	Proposed Price - Existing Tariff	Tariff Rate Source	Proposed Price - True-Up	True-up Rate Source
<b>Operator Services</b>					
<b>Operator Call Processing Access Service</b>					
Operator Provided, Per Minute					
Using BST LIDB	\$1.3429			\$1.35	TELRIC
Using Foreign LIDB	\$1.3644			\$1.36	TELRIC
Fully Automated, Per Attempt					
Using BST LIDB	\$0.0771			\$0.08	TELRIC
Using Foreign LIDB	\$0.0963			\$0.10	TELRIC
<b>Inward Operator Services Access Service</b>					
Verification, Per Call	\$0.9042	\$0.90	E18.1		
Emergency Interrupt, Per Call	\$0.9612	\$1.95	E18.1		
<b>Directory Assistance Access Service Calls</b>					
Per Call	\$0.2889	\$ .25	E9.5.3		
<b>Directory Assistance Database Service</b>					
Use Fee, Per DADS Cust's EU Request/Listing	\$0.0193	\$ .035	A38.1.3		
Monthly Recurring	\$121.08	\$150.00	A38.1.3		
<b>Direct Access to Directory Assistance Service (DADAS)</b>					
Database Service Charge, Per Month	\$7,254.46	\$5,000.00	FCC 1, Sec.9		
Database Query Charge, Per Query	\$0.0062	\$0.023	FCC 1, Sec.9		
Nonrecurring - DADAS Service Establishment		\$1,000.00	FCC 1, Sec.9		
<b>DACC Access Service</b>					
Per Call Attempt	\$0.0201			\$ .25	Cost Estimate
<b>Number Services Intercept Access Service</b>					
Per Intercept Query	\$ .0062			\$ .25	Cost Estimate
<b>Directory Transport</b>					
Switched Common Transport					
Per DA Service Call	\$ .000978	\$ .00030	E9.5.3		
Switched Common Transport					
Per DA Service Call Mile	\$ .000022	\$ .00004	*		
Access Tandem Switched					
Per DA Service Call	\$ .003408	\$ .00065	*		
Sw. Local Channel - DS 1 Level, Per Month		\$133.81	*		
Nonrecurring - First/additional		\$866.97 / \$488.83	*		
Sw. Dedicated Transport - DS 1 level, Per Mi/Per Mo.		\$23.00	*		
Facilities Termination, Per Month		\$80.00	*		
Nonrecurring		\$100.48	*		
DA Interconnection per DA Access Service Call		\$ .00288	E9.5.3		
<b>Installation</b>					
NRC - Per Trunk or Signaling Connection					
First/additional		\$815.00 / \$100.00	*		

SOUTH CAROLINA - BELL SOUTH TELRIC AND PROPOSED PRICES						
UNBUNDLED ELEMENT	BST	Proposed Price - Existing Tariff	Tariff Rate Source	Proposed Price - True-Up	True-up Rate Source	
	TELRIC Filed					
Collocation						
Application						
Per Arrangement / Per Location - Nonrecurring					\$3850.00	VEIS/ICI Agree
Space Preparation Fee - Nonrecurring						ICB ICI Agreement*
Space Construction Fee - Nonrecurring					\$4500.00	Cost Est.
Cable Installation - Per Entrance Cable - Nonrecurring					\$2750.00	VEIS rate**
Floor Space Zone A, Per Square Foot, Per Month					\$7.50	ICI Agreement
Floor Space Zone B, Per Square Foot, Per Month					\$6.75	ICI Agreement
Power Per AMP, Per Month					\$5.00	ICI Agreement
Cable Support Structure, Per Entrance Cable					\$13.35	ICI Agreement
POT Bay (Optional Point of Termination Bay)						
Per 2-Wire Cross - Connect, Per Month	\$3.08				\$4.40	TELRIC
Per 4-Wire Cross - Connect, Per Month	\$1.14				\$1.20	ICI Agreement
Per DS1 Cross - Connect, Per Month					\$1.20	ICI Agreement
Per DS3 Cross - Connect, Per Month					\$8.00	ICI Agreement
Cross-Connects						
2-Wire Analog, Per Month	\$3.31				\$3.30	ACSI neg. rate
4-Wire Analog, Per Month	\$8.81				\$5.50	ACSI neg. rate
Nonrecurring 2-wire and 4-wire					\$8.00	ACSI neg. rate
DS1, Per Month					\$8.00	ICI Agreement
Nonrecurring - First/Additional				\$155.00 / \$27.00		VEIS referenced est.
DS3, Per Month					\$72.00	ICI Agreement
Nonrecurring - First/Additional				\$155.00 1st / \$27.00		VEIS referenced est.
Security Escort						
Basic - 1st half hour - Nonrecurring					\$41.00	ICI Agreement
Overtime - 1st half hour - Nonrecurring					\$48.00	ICI Agreement
Premium - 1st half hour - Nonrecurring					\$55.00	ICI Agreement
Basic - additional - Nonrecurring					\$25.00	ICI Agreement
Overtime - additional - Nonrecurring					\$30.00	ICI Agreement
Premium - additional - Nonrecurring					\$35.00	ICI Agreement
*ICI Agreement - Intermedia Communications, Inc. Agreement is referenced as an example of agreement which includes similar negotiated collocation rates.						
** VEIS - Virtual Expanded Interconnection Service - Rates similar to VEIS rates						

BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA  
DOCKET NO. 96-358-C - ORDER NO. 97-712  
AUGUST 19, 1997

IN RE: Petition of AT&T Communications of the ) ORDER  
Southern States, Inc. for Arbitration ) GRANTING  
with BellSouth Telecommunications, Inc. ) MOTION FOR  
 ) CREATION OF  
 ) A DOCKET

This matter comes before the Public Service Commission of South Carolina (the Commission) pursuant to the Motion by AT&T Communications of the Southern States, Inc. (AT&T) for the establishment of a Generic Docket on Unbundled Network Element (UNE) costs, and to establish a hearing schedule which permits consideration of all parties interests and views and allows for adequate preparation time, including time for discovery, so that a complete record can be generated.

In support of its Motion, AT&T notes several factors. Pursuant to Order No. 97-189, issued in the present Docket, the Commission set certain interim prices for the UNEs, including prices for called transport and termination and certain support elements relating to network interconnection. The Commission has required BellSouth Telecommunications, Inc. (BellSouth) to furnish verifiable cost studies for UNEs and that a true-up process be conducted to ascertain the actual cost of elements, on the basis of which permanent cost-based prices can be established.

It appears to this Commission that the Motion of AT&T has merit. AT&T states that in lieu of a cost proceeding under the present Docket, that the Commission should institute a Generic Cost Studies Docket to determine permanent cost based UNE rates to be offered by BellSouth to AT&T and all other carriers interconnecting with BellSouth. According to AT&T, such a Generic Proceeding would preserve the rights of parties subject to an arbitrated agreement, like AT&T and BellSouth, and protect the due process rights of other carriers, the Consumer Advocate for the State of South Carolina (the Consumer Advocate) and other potential Intervenor affected by the level of BellSouth's UNE rates. Also, AT&T claims that a Generic Docket would be advantageous to the Commission in resolving the question of BellSouth's UNE costs in a single proceeding.

The Commission has examined this matter, and hereby grants the Motion of AT&T for establishment of a Generic Docket in this matter, based on the reasoning stated above. We shall consider the hearing schedule at a later time.

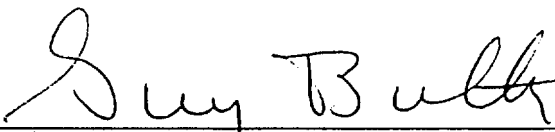


DOCKET NO. 96-358-C - ORDER NO. 97-712  
AUGUST 19, 1997  
PAGE 3

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This Order shall remain in full force and effect until  
further Order of the Commission.

BY ORDER OF THE COMMISSION:

  
Chairman

ATTEST:

  
Executive Director

(SEAL)

BELLSOUTH PRICE LIST - SOUTH CAROLINA

CHECK LIST ITEM NUMBER	RATE ELEMENT	PROPOSED RATES	
		MONTHLY RECURRING	NONRECURRING
1. Interconnection &	Interconnection & Reciprocal Compensation *		
13. Reciprocal Com-	End Office Switching, per min	\$ 0.003	
ensation	Tandem Switching, per min	\$ 0.0015	
	Common Transport per mile per min	\$ 0.00011	
	Common Transport Facility Termination per min	\$ 0.00042	
	Intermediary Tandem per min (1)	\$ 0.002	
2. Nondiscriminatory	Collocation - Physical *		
Access to	Application Fee		\$ 3,880.00
Network Elements	Space Preparation Fee		ICB
	Space Construction Fee		\$ 4,500.00
	Cable Installation - Per Entrance Cable		\$ 2,750.00
	Floor Space Zone A, Per Square Foot	\$ 7.50	
	Floor Space Zone B, Per Square Foot	\$ 6.75	
	Power, Per AMP	\$ 5.14	
	Cable Support Structure, Per Entrance Cable	\$ 13.36	
	POT Bay (Optional Point of Termination Bay)		
	per 2-Wire cross-connect, per month	\$ 0.40	
	per 4-Wire cross-connect, per month	\$ 1.20	
	per DS1 cross-connect, per month	\$ 1.20	
	per DS3 cross-connect, per month	\$ 5.00	
	Cross-Connects		
	2-Wire Analog Cross Connect	\$ 0.30	\$ 8.00
	4-Wire Analog Cross Connect	\$ 0.50	\$ 8.00
	DS1 Cross Connect	\$ 8.00	\$ 155.00 - First
			\$ 27.00 - Add'l
	DS3 Cross Connect	\$ 72.48	\$ 155.00 - First
			\$ 27.00 - Add'l
	Security Escort		
	Basic - 1st half hour		\$ 41.00
	Overtime - 1st half hour		\$ 48.00
	Premium - 1st half hour		\$ 56.00
	Basic - additional		\$ 28.00
	Overtime - additional		\$ 30.00
	Premium - additional		\$ 38.00
	Collocation - Virtual	Rates as set forth in Section 30 of BBT's PCC Tariff No. 1.	
	Dark Fiber (2)		
	- Per each four-fiber dry fiber arrangement	-	\$ 1,000.00 - First
	- Per each fiber strand per route mile or fraction thereof	\$ 100.00	\$ 922.00 - Add'l
* Rates are subject to true-up. However, the rate for any local interconnection or unbundled network element placed in service at a rate subject to true-up before the Commission orders rates true-up shall be capped at the rate set out in this price list for the remainder of the term of this Statement.			
Notes:			
1. The intermediary Charge applies only to intermediary traffic and is applied in addition to applicable interconnection charges.			
2. Rates mirror Dry Fiber rates contained in Sec. 7 of BBT's Interstate Access Tariff, PCC No. 1.			

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BELLSOUTH PRICE LIST - SOUTH CAROLINA

CHECK LIST ITEM NUMBER	RATE ELEMENT	PROPOSED RATES	
		MONTHLY RECURRING	NONRECURRING
6. Unbundled Local Switching	Unbundled Local Switching *		
	End Office Switching usage, per mou (1)	\$ 0.003	
	Unbundled Ports		
	- 2 Wire Analog Port, per line	\$ 2.70	\$ 50.00 - First
			\$ 18.00 - Add'l
	- 4 Wire Analog Port, per line	\$ 4.00	\$ 50.00 - First
			\$ 18.00 - Add'l
	- 2 Wire ISDN Digital Port, per line	\$ 14.00	\$ 150.00 - First
			\$ 120.00 - Add'l
	- 4 Wire ISDN DS1 Port, per line	\$ 120.00	\$ 230.00 - First
			\$ 200.00 - Add'l
	- 2 Wire Analog Hunting, per line	\$ 0.30	\$ 3.00 - First
			\$ 3.00 - Add'l
7 (I) Access to 911 and E911 services	Access to 911 and E911 Services		
7 (II) Access to OA	Directory Assistance Access Service		
	OA Call Completion Access Service, per attempt *	\$ 0.25	
	Call Completion Access Termination Charge per completed call*	\$ 0.08	
	Number Services Intercept Access Service, per query *	\$ 0.30	
	OA Access Service Call, per call *	\$ 0.25	
	Directory Transport		
	- Sw. Local Channel - DS1 Level, per LC, per month *	\$ 133.81	\$ 866.97 - First
			\$ 486.83 - Add'l
	- Sw. Dedicated Transport - DS1 level, Per Mile, per month	\$ 23.60	
	- Facilities Termination, per month	\$80.00	\$ 100.49
	- Switched Common Transport, per OA Ass. Svc. Call *	\$ 0.0005	
	- Switched Common Transport, per OA Ass. Svc. Call Mile *	\$ 0.00004	
	- Access Tandem Switching, per OA Ass. Svc. Call *	\$ 0.00005	
	- OA Interconnection, per OA Ass. Svc. Call *	\$ 0.00005	
	- Installation, trunk side ovs., per trunk or signaling *		\$ 915.00 - First
	connection *		\$ 100.00 - Add'l
	OA Database Service		
	- Use Fee, per OAAS customer's end user request *	\$ 0.005	
	- Monthly recurring charge *	\$ 180.00	
	Direct Access to OA Service		
	- OAAS Service Establishment Charge *		\$ 1,000.00
	- OAAS Database Service Charge, per month *	\$ 5,000.00	
	- OAAS per Query Charge *	\$ 0.005	
* Rates are subject to true-up. However, the rate for any local interconnection or unbundled network element placed in service at a rate subject to true-up before the Commission orders rates true-up shall be capped at the rate set out in this price list for the remainder of the term of this Statement.			
Notes:			
1. The rates for individual vertical features will be set by Order of the Commission in a separate docket. No charges will be assessed for the activation and use of vertical features until that time. Rates established by the Commission for these features will be applied prospectively from the date they are established.			

BELLSOUTH PRICE LIST - SOUTH CAROLINA

CHECK LIST ITEM NUMBER	RATE ELEMENT	PROPOSED RATES	
		MONTHLY RECURRING	NONRECURRING
7 (III) Access to Operator Call Completion svcs.	Operator Services • Operator Provided Call Handling using BST LDCB, per min.* • Operator Provided Call Handling using foreign LDCB, per min.* • Call Completion Access Termination Charge per call attempt* • Fully Automated Call Handling using BST LDCB, per attempt* • Fully Automated Call Handling using foreign LDCB, per attempt* • Busy Line Verification Service, per occurrence • Emergency Interrupt Service, per occurrence	\$ 1.17 \$ 1.17 \$ 0.08 \$ 0.18 \$ 0.18 \$ 0.90 \$ 1.95	
	Non-Sent Paid Report System (NSPRS)* • IntraState, per message • CATS, per message • Non-continuous, per message	\$ 0.08 \$ 0.08 \$ 0.18	
	OLIC Daily Usage File (ODUF)* • Recording Service (only applied to unbundled operator services messages), per message • Message Distribution, per message • Data Transmission, per message	\$ 0.008 \$ 0.004 \$ 0.001	
8. White Page Directory Listings	Subscriber Listing Information	(1) No charge for customers' primary listings. (2) Additional listings and optional listings are provided at rates set forth in BST's IntraState General Subscriber Service Tariff.	
9. Access to Tele- phone Numbers	Access to Numbers	No Charge	
10. Nondiscriminatory Access to Databases & Associated Signaling Necessary for Call Routing & Completion	Unbundled Signaling* CCS7 Signaling Connections (Links) • "A" Link, per link, per month • "B" Link, per link, per month Signal Transfer Point, per message Signal Control Point / Database, per message Signal Transfer Point, per port per month Signaling Usage, Per 56 Kbps Facility, per month (1)	\$ 155.00 \$ 155.00 \$ 0.000005 \$ 0.000005 \$ 385.00 \$ 385.00	Call Setup Mo TCAP Mo
	Service Control Points Link Validation • Common Transport per query, per month* • Link Validation, per query* • Orig. Point Code Establishment or Change, per estab. or change*	\$ 0.00000 \$ 0.00000 \$ 51.00	
* Rates are subject to true-up. However, the rate for any local interconnection or unbundled network element placed in service at a rate subject to true-up before the Commission orders rates true-up shall be capped at the rate set out in this price list for the remainder of the term of this Statement.			
Note(s):			
1. Where signaling usage measurement and billing capability exists, CCS7 Signaling Usage will be billed on a per message basis. Where measurement capability does not exist, CCS7 Signaling Usage will be billed on a per 56 Kbps facility basis.			

BELLSOUTH PRICE LIST - SOUTH CAROLINA

CHECK LIST ITEM NUMBER	RATE ELEMENT	PROPOSED RATES	
		MONTHLY RECURRING	NONRECURRING
10. (Cont'd)	Service Central Points (Cont'd)		
	800 Access Ten Digit Screening Service		
	• Per 800 Call Utilizing 800 Ass.Ten Digit Screening Svs. w/800 Number Delivery, per message	\$ 0.0040	
	• Per 800 Call Utilizing 800 Ass.Ten Digit Screening Svs. w/800 Number Delivery, for 800 Numbers, w/ Optional Complex Features, per message	\$ 0.0048	
	• Per 800 Call Utilizing 800 Ass.Ten Digit Screening Svs. w/POTS Number Delivery, per message	\$ 0.0040	
	• Per 800 Call Utilizing 800 Ass.Ten Digit Screening Svs. w/POTS Number Delivery, w/Optional Complex Features, per message	\$ 0.0048	
	• Reservation Charge per 800 Number reserved		\$ 28.00 - First
			\$ 0.50 - Add'l
	• Establishment Charge per 800 number established w/ 800 Number Delivery		\$ 60.00 - First
			\$ 1.50 - Add'l
	• Est. Charge per 800 number est. w/POTS Number Delivery		\$ 60.00 - First
			\$ 1.50 - Add'l
	• Customized Area of Service Per 800 Number		\$ 3.00 - First
			\$ 1.50 - Add'l
	• Multiple InterLATA Carrier Routing per carrier requested, per 800 number		\$ 3.50 - First
			\$ 2.00 - Add'l
	• Change Charge per request		\$ 40.50 - First
			\$ 0.50 - Add'l
	• Call Handling and Destination Features per 800 number		\$ 3.00
11. Number Portability	Interim Number Portability		
	Remote Call Forwarding (RCF)		
	• Business Line, per number ported *	\$ 1.50	
	• Residence Line, per number ported *	\$ 1.25	
	• Additional capacity for simultaneous call forwarding, per additional port *	\$ 0.50	
	• Rate per order, per end user location *		\$ 25.00
* Rates are subject to true-up. However, the rate for any local interconnection or unbundled network element placed in service at a rate subject to true-up before the Commission orders rates true-up shall be capped at the rate set out in this price list for the remainder of the term of this Statement.			

**BELLSOUTH PRICE LIST - SOUTH CAROLINA**

CHECK LIST ITEM NUMBER	RATE ELEMENT	PROPOSED RATES	
		MONTHLY RECURRING	NONRECURRING
11. Number Portability (Cont'd)	Interim Number Portability (Cont'd)		
	Direct Inward Dialing (DID)		
	- Business, per number ported *	\$ 0.01	\$ 1.00
	- Residence, per number ported *	\$ 0.01	\$ 1.00
	- Rate per order, per end user location *		\$ 25.00
	- SPNP-DID Trunk Termination, per trunk *	\$ 13.00	\$ 164.00 - Initial
			\$ 81.00 - Subsequent
	- DS1 Local Channel, per Local Channel (1), (2) *	\$ 133.81	\$ 888.97 - First
			\$ 486.83 - Add'l
	- DS1 Dedicated Transport (1), (2)		
	- Per mile	\$ 23.60	
	- Facilities Termination, per min	\$ 90.00	\$ 100.49
12. Local Dialing Parity	Local Dialing Parity	No Charge	
13. Reciprocal Compensation	See Checklist Item #1		
		Discount Rate	
14. Resale	Wholesale Discount as a Percentage of BST's Retail Services Rates	14.8%	
* Rates are subject to true-up. However, the rate for any local interconnection or unbundled network element placed in service at a rate subject to true-up before the Commission orders rates true-up shall be capped at the rate set out in this price list for the remainder of the term of this Statement.			
Note(s):			
1. Rates are displayed at the DS1 level.			
2. May not be required if the OLEC is collected at the ported number end office.			

BellSouth South Carolina  
271 Application - CC Docket 97-208

October 23, 1997

AT&T Meeting  
with the  
Federal Communications Commission



## AT&T's Efforts to Enter South Carolina

- AT&T has sought to enter the South Carolina market using the three vehicles available under the Act.
  - Resale
  - Unbundled Network Elements
  - Facilities

## AT&T Entry Efforts - Timeline

- 2/29/96 AT&T certificated as a local provider.
- 3/4/96 Region-wide negotiations begin.
- 3/11/96 AT&T requests UNEs.
- 3/28/96 AT&T provides requirement document for purchase of UNE combinations.
- 6/12/96 AT&T makes request for interconnection.
- 6/20/96 AT&T requests ability to order 8 UNE combinations by November, 1996.

## AT&T Entry Efforts - Timeline

- 11/15/96 Petition for arbitration filed.
- 2/3-5/97 Arbitration hearings.
- 3/10/97 Arbitration order.
- 6/2/97 Interconnection Agreement signed.
- 6/20/97 SCPSC approves Interconnection Agreement.
- 7/18/97 AT&T appeals SCPSC order approving Interconnection Agreement.

## BellSouth's Strategy Has Been to Limit CLECs To One Form of Entry

- BellSouth's strategy:
  - Restrict resale
  - Restrict UNEs
  - Limit competition to facilities build-out

## BellSouth Has Maintained Barriers to Entry in South Carolina

- Failure to offer all services for resale in compliance with the Act.
- Failure to provide cost-based interconnection and UNE prices.
- Failure to provide nondiscriminatory access to UNEs and combinations of UNEs.
- Failure to provide nondiscriminatory access to its OSSs.

## BellSouth Has Not Proved That Its Resale Offer Complies With The Act

- BellSouth has submitted no data by which the Commission could find its resale rates compliant.
- Further, its methodology and resulting 14.8% wholesale discount violates the Act.
- The refusal to offer contract service arrangements at a wholesale discount for resale violates the Act.
- The limitations on resale of CSAs violate the Act.

# The Wholesale Discount Does Not Comply With The Act

- BellSouth submitted no data, but relied solely on the SCPSC.
- The SCPSC order does not establish compliance
  - Endorses an “actually avoided” methodology
  - Adjusts rate from 13.2% to 14.8%
  - Provides no explanation for adjustments, and adjustments conflict with Commission’s interpretation
- The 14.8% discount precludes effective resale entry.
  - Lowest in region
  - FCC regional proxy is 19.2%
  - Additional non-cost based “new install charges on CLEC migration orders.

## The Limitations on Resale of CSAs Do Not Comply With The Act

- The SGAT provides no wholesale discount. SGAT XIV.B.1.
- The contract terms are available only to the contracted customers on the same rates, terms and conditions.
- CLECs are prohibited from aggregating customers to achieve volume or revenue triggers to meet contract requirements and obtain discounts.



## BellSouth Is Increasingly Using CSAs to Tie Up Customers in South Carolina

- BellSouth's use of CSAs has increased dramatically.
  - 41 in 1995.
  - 66 in 1996.
  - 141 through 9/30/97.
- CSAs in South Carolina account for almost \$300 million in minimum revenue commitments.
- CSAs have significant termination penalties.
  - E.g., \$2 million penalty if 3-year contract is terminated in first year. \$1 million penalty in second year.